

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

LAURA LOOMER

Plaintiff,

v.

RASHIDA HARBI TLAIB

Defendants.

RECEIVED

OCT 11 2019

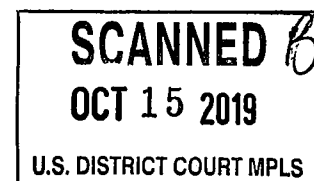
FRK, U.S. DISTRICT CO  
MINNEAPOLIS, MINNESOTA

Case No: 19-cv-2322

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT**

Plaintiff Laura Loomer ("Loomer") respectfully moves this the Clerk and this Court for entry of a default as to Rashida Harbi Tlaib. ("Tlaib"), in accordance with the provisions of Federal Rule of Civil Procedure ("FRCP") 55(b)(2) and in support shows the Clerk and this Court the following:

1. On August 22, 2019, Plaintiff Loomer filed in the U.S. District Court for the District of Minnesota a Complaint.
2. On September 11, 2019, a copy of this Complaint and a Summons in a Civil Action were served upon Defendant Tlaib located at 1628 Longworth HOB, Washington DC 20515. A copy of the Affidavit of Process Server is attached hereto as Exhibit 1 and is incorporated herein by reference.
3. Since being served on September 11, 2019, Defendant Joel Tlaib has failed to answer the Complaint substantively, only filing a frivolous and non-substantive Motion to Dismiss without any memorandum of law within the twenty-one (21) day period and has therefore defaulted.



4. Pursuant to the provisions of FRCP 55(b)(2), the Clerk and this Court are empowered to enter a default against Defendant Tlaib for relief sought by Plaintiff Loomer in her Complaint.

**Dated:** October 10, 2019

Respectfully submitted,

  
LAURA LOOMER

*Of Counsel:*  
Larry Klayman, Esq.  
Freedom Watch, Inc.  
2020 Pennsylvania Ave NW # 345  
Washington, DC, 20006  
Tel: 561-558-5536  
Email: [leklayman@gmail.com](mailto:leklayman@gmail.com)

Pro Hac Vice to Be Submitted

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via Federal Express to the clerk of the Court and served to all counsel of record at 100 Washington Avenue South, Suite 2200 Minneapolis, MN 55401-2159 via U.S. mail on October 10, 2019

  
LAURA LOOMER